

# STATE OF ALASKA

## DEPARTMENT OF FISH AND GAME

### OFFICE OF THE COMMISSIONER

**SARAH PALIN, GOVERNOR**

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August 24, 2007

Doug Mecum, Acting Administrator  
National Marine Fisheries Service, Alaska Region  
National Oceanic and Atmospheric Administration  
P. O. Box 21668  
Juneau, AK 99802

Dear Mr. Mecum:

Thank you for providing an opportunity to review the April 2007 internal draft of a final conservation plan prepared by the National Marine Fisheries Service (NMFS) for the Cook Inlet stock of beluga whales. I particularly appreciate your recent efforts to recognize that our department is not a member of the public and, as the trustee for wildlife in the State of Alaska (State), shares responsibility with your agency for assuring maintenance of sustainable populations of beluga whales. Until your recent efforts, the State had not been included in the development of the cooperative conservation plan and was only provided one opportunity also afforded the public to review the 2005 draft plan. I hope that you will continue to encourage your agency to fully involve our significant interests and expertise in all aspects of the conservation of these whales and others species.

Enclosed are detailed comments intended to provide constructive recommendations to improve the final plan. The comments address multidisciplinary studies, prioritization of those studies, funding, and implementation of the Recovery Program. The plan needs to be comprehensively updated to address comments your agency received on the 2005 draft and to incorporate recent research on beluga as well as other biological and physical characteristics of the habitat.

We believe that the most important change needed involves improved coordination with the State and other entities to finalize and cooperatively implement a conservation plan for the Cook Inlet stock of beluga whales. NMFS committed in the 2000 rule to pursue such action with the State, other agencies, non-government organizations, and the public. The lack of progress during the intervening seven years needs should be corrected in order to involve all of those entities, to increase funding, and to implement interdisciplinary research and management of the beluga whales and their habitat.

In order to immediately pursue progress, I propose that NMFS and the State enter into a cooperative agreement to jointly develop and implement a conservation plan for Cook Inlet beluga whales. We would jointly establish the necessary multidisciplinary team under the umbrella of that cooperative agreement. Participation would include government, university, and

other entities in the area that desire a role in the development, funding, and implementation of the conservation plan. Through this cooperative agreement between our agencies, NMFS would continue to implement its agreements with the Native participants and retain your responsibility under the Marine Mammal Protection Act.

In order to initiate this cooperative agreement and identify the multidisciplinary team to finalize, fund, and implement a conservation plan, I urge we pursue this effort at your earliest convenience.

Sincerely,

A handwritten signature in blue ink, appearing to read "Denby S. Lloyd".

Denby S. Lloyd  
Commissioner

Enclosures: Attachment 1 (page 3) – Summary of Major Comments  
Attachment 2 (page 4) – General Comments  
Attachment 3 (page 10) – Comments on Specific Sections of the Plan  
Attachment 4 (page 39) – Conclusion

cc: Kaja Brix, Assistant Regional Administrator, Resources Protection, NMFS  
Mike Nizich, Deputy Chief of Staff, Office of the Governor